



# Hiinono'einino'

PO Box 67 St. Stephens WY 82524

## **PUBLIC COMMENT: WYOMING CHAPTER 68 GRIZZLY BEAR HUNTING SEASONS**

FAO – WYOMING GAME AND FISH COMMISSION.

The Northern Arapaho Elders Society (hereafter “NAES”) is appalled at the prospect of a trophy hunt for the grizzly bear, and we petition the Wyoming Game and Fish Commission to halt all plans for a grizzly bear hunt and to suspend Wyoming’s Chapter 68 Grizzly Bear Hunting Seasons. Our objections are summarized in *Crow Tribe et al v. Zinke* and need not be repeated here as that complaint is in the public domain. Succinctly put, the grizzly bear is fundamental to our culture and ceremonial way of life. The grizzly bear is not a “trophy game animal”; the grizzly is our relative, an ancient teacher of sacred ways and a two-legged being, like us. What do you propose next? A trophy hunting season on us?

Both the NAES and the Northern Arapaho Business Council (hereafter “NABC”) have submitted numerous documents to federal and multi-jurisdictional authorities opposing the delisting and trophy hunting of the grizzly bear in the Greater Yellowstone Ecosystem (GYE). Regardless of whether we sent letters, made statements, or presented sworn affidavits, none of these submissions or our concerns have been addressed. Roy Brown, the current chairman of the NABC, has a prominent role in the Rocky Mountain Tribal Leaders Council (RMTLC), and the RMTLC has just reaffirmed its long-held stance against trophy hunting the grizzly bear in a letter to the Wyoming Game and Fish Commission (4/27).

The NAES has governing authority under the traditional governmental system of the Northern Arapaho Tribe. The Northern Arapaho Tribe did not adopt the Indian Reorganization Act. The NABC is the elected governing body of the Northern Arapaho Tribe. Authority for matters related to the grizzly bear rests with the NAES. In a letter to the Secretary of the Interior dated 10/18/16 the NAES and NABC jointly - explicitly and without equivocation - reaffirmed the Northern Arapaho Tribe’s opposition to the delisting of the grizzly bear from the ESA and the trophy or “sport” hunting of the grizzly bear.

The NAES reiterates here what it has stated multiple times: In its final rule delisting the grizzly bear in the GYE, the US Fish and Wildlife Service claims, “all three affected States and the Eastern Shoshone and Northern Arapaho Tribes of the WRR will classify grizzly bears in the GYE as game animals.” This is categorically false. In a letter to the Secretary of the Interior dated 10/18/16 the NAES and NABC jointly stated: “The Northern Arapaho . . . opposes in the strongest possible terms the delisting of the grizzly in Greater Yellowstone, and the State of Wyoming’s ‘Grizzly Bear Management Plan,’ a document that is antithetical to our culture, and that we will not adopt in any form. The idea of trophy hunting the grizzly bear is abhorrent to us; we do not condone killing, and we do not murder our relatives. The grizzly bear is sacred to our people and has been since time immemorial.”

In a letter to the Interagency Grizzly Bear Committee (IGBC) – Yellowstone Ecosystem Subcommittee dated 4/13/2017 the NAES reiterated: “We will not permit the trophy hunting of our sacred relatives on our lands.” With this submission, we reaffirm that position. When we say, “our lands,” we do not only refer to the Wind River Indian Reservation shared with the Eastern Shoshone Tribe, but the entire Greater Yellowstone Ecosystem that the Northern Arapaho Tribe has treaty, ancestral, and reserved rights to, alongside the twenty-six other tribal nations the federal government categorizes as “Associated Tribes of Yellowstone.” The lands Wyoming intends to hold this grizzly bear hunt on are ancestral tribal lands, now under the management jurisdiction of the US Forest Service and BLM.

The Northern Arapaho, in common with the other “Associated Tribes of Yellowstone,” have a multitude of sacred and historic sites throughout those lands. Before any activity takes place on those lands that impacts us and the other tribes with rights and interests in this region, NHPA and NEPA must be followed to the fullest extent. A great deal of hostility has been generated toward tribes and tribal members during the delisting process, due to our opposition to this trophy killing of the grizzly, and it takes only one malcontent to destroy a cultural site. As it stands, an unknown number would be marching into our ancestral lands to kill our sacred relative for “fun,” so the potential for desecration of sacred sites is intolerably high.

The NAES finds it unconscionable that Wyoming intends to allow the killing of up to 14 female grizzlies in one hunt. It is very likely that a proportion of those females will be pregnant, as this hunt is to take place in the fall. The grizzly bear has one of the slowest reproductive rates of any mammal, so what justification can there be for this? We also consider it both callous and reckless that Wyoming is going to permit the baiting of grizzly bears; by doing this, the state not only removes any pretense of “fair chase,” but may very well be responsible for the death or serious injury of an unwitting recreationist who is unfortunate enough to enter an area where bait has or is being used. All contemporary, peer-reviewed scientific analysis on the grizzly and brown bear runs counter to claims being made by Wyoming to find acceptance for its grizzly trophy hunt. It is a falsehood that this trophy hunt reflects the best available science. What it does do is ensure that the grizzly will never be a recovered species, and in the GYE, will soon be back on life-support. Whether the ESA will still exist to save the grizzly when this occurs is debatable.

We refer you to the affidavit the NAES submitted to federal authorities 6-29-2017.

Thank you.

*Nelson White Sr.*      *Crawford White Sr.*

Nelson White, Sr.

Crawford White, Sr.

April 28, 2018.

